

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9)	Civil Action No. 7:20-cv-00947-DCC
Plaintiff(s),)	
)	
v.)	DEFENDANTS MG FREESITES, LTD
)	AND MINDGEEK S.A.R.L.’S RULE
)	26(a)(2) DISCLOSURES
COLLINS MURPHY et al)	
Defendant(s).)	
)	
JANE DOE)	Civil Action No. 7:21-cv-03193-DCC
Plaintiff(s),)	
)	
v.)	DEFENDANT MG FREESITES, LTD
)	RULE 26(a)(2) DISLOSURES
)	
COLLINS MURPHY et al)	
Defendant(s).)	

Defendants MG Freesites, LTD, and Mindgeek S.A.R.L. (“Defendants”) disclose the following expert witnesses who may be called pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure.

Fed. R. Civ. P. 26(a)(2) DISCLOSURE AND CERTIFICATION

1. **Janine S. Shelby, Ph.D.**
Park Dietz & Associates, Inc.
2906 Lafayette
Newport Beach, CA 92663
Tel: 949-723-2211

Dr. Shelby will provide a rebuttal to the Expert Report of Peter I. Collins. Dr. Shelby will evaluate and respond to the opinions rendered by Plaintiffs' designated expert in the Collins Report—and will opine on topics including, but not limited to, the sources relied on by Collins, the absence of examinations by Collins, and the heterogeneity of individuals' reactions to

stressors. Additionally, if the Court approves independent mental examinations pursuant to Fed. R. Civ. P. 35, Dr. Shelby will conduct independent mental examinations and provide an additional report of her findings. Dr. Shelby's rebuttal report has been provided contemporaneously with this disclosure, along with her hourly rate, curriculum vitae, and a testimony listing.

2. **Sherrie Caltagirone**

c/o Quinn Emanuel Urquhart & Sullivan, LLP
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
Tel: 213-443-3000

Ms. Caltagirone will provide a rebuttal to the Expert Reports of Tim Weaver and W. Scott Brandon. Ms. Caltagirone will evaluate and respond to the opinions rendered by Plaintiffs' designated experts in the Weaver Report and Brandon Report—including, but not limited to, content moderation practices of MindGeek as they relate to non-consensual and/or "voyeuristic" videos posted to its websites. Ms. Caltagirone's rebuttal report has been provided contemporaneously with this disclosure, along with her hourly rate, curriculum vitae, and a testimony listing.

CERTIFICATION

The undersigned counsel for Defendants certifies that he has complied with Fed. R. Civ. P. 26(a)(2)(B) by serving the required materials upon counsel for Plaintiffs.

SIGNATURE PAGE TO FOLLOW

TURNER, PADGET, GRAHAM & LANEY, P.A.

March 18, 2024

By: s/ Mark B. Goddard

Mark B. Goddard (Fed. I.D. # 9163)

Post Office Box 1473

Columbia, SC 29202

Phone: (803) 254-2200

Fax: (803) 400-1542

MGoddard@TurnerPadget.com

**ATTORNEYS FOR DEFENDANTS MG
FREESITES, LTD AND MINDGEEK S.A.R.L.**